

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
)	No. 04-10345-NMG
)	
v.)	
)	
MOHAMMED ABDUL RASHEED QUARAISHI)	

DEFENDANT MOHAMED ABDUL RASHEED QUARAISHI'S
MOTION FOR LEAVE TO FILE REPLY TO GOVERNMENT'S OPPOSITION
TO MOTION TO VACATE SEIZURE WARRANT AND/OR HOLD AN
EVIDENTIARY HEARING

NOW COMES Defendant Mohammed Abdul Rasheed Quaraishi ("Rasheed") and hereby moves for leave to file a Reply to the Government's Opposition to Motion to Vacate Seizure Warrant and/or Hold an Evidentiary Hearing ("Opposition").

In support whereof, Rasheed states as follows:

1. On April 11, 2005, Rasheed filed a Motion to Vacate Seizure Warrant or, Alternatively, for Evidentiary Hearing ("Motion to Vacate") on grounds including Fifth and Sixth Amendment rights and related case law.
2. On April 25, 2005, the Government filed its Opposition.
3. In its Opposition, the Government argues that Rasheed's motion is "both procedurally and substantively flawed" on alleged grounds not addressed in Rasheed's Motion to Vacate.
4. Rasheed respectfully submits that a Reply is necessary to allow him to meaningfully address the Government's allegations (and, thus, to assert his Constitutional

rights), and, further, that such Reply would assist the Court on its treatment of the issues presented.

5. Accordingly, Rasheed has submitted herewith – *ex parte* and by mail – Defendant Mohammed Abdul Rasheed Quaraishi's Reply to Government's Opposition to Motion to Vacate Seizure Warrant and/or Evidentiary Hearing; such motion shall be filed electronically if the Court allows his Motion for Leave to File.

WHEREFORE, Rasheed respectfully requests that the Court allow his Motion for Leave to File a Reply to the Government's Opposition to Motion to Vacate Seizure Warrant and/or Hold an Evidentiary Hearing.

Respectfully submitted,
MOHAMMED ABDUL RASHEED
QUARAISHI
By his attorneys,

/s/ Frank A. Libby, Jr.
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